

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Revision of the Commission's
Rules to Ensure Compatibility
with Enhanced 911 Emergency
Calling Systems

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CC Docket No. 94-102

WT Docket No. 00-80

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OFFICE OF THE SECRETARY

REPLY COMMENTS OF AT&T WIRELESS SERVICES, INC.

AT&T Wireless Services, Inc. ("AT&T"), by its attorneys, hereby replies to the comments filed regarding call back number issues associated with non-service initialized wireless 911 calls.^{1/} Most of the commenters agree that the Commission should not require call back numbers for non-service initialized phones because the substantial costs of such an effort -- if it is technically feasible at all -- would far outweigh the meager benefits.^{2/} In fact, as certain commenters note, imposing such a requirement could undermine public safety efforts by chilling participation in handset donation programs.^{3/}

In their comments, the Public Safety Entities clarify that they are not requesting that the Commission require call back numbers for non-service initialized phones. Rather, the Public Safety Entities suggest other means of improving the emergency services available to callers with non-service initialized phones, such as providing a means of alerting a 911 call taker that

^{1/} See Public Notice, Comment Sought on Request for Further Consideration of Call Back Number Issues Associated with Non-Service Initialized Wireless 911 Calls, CC Docket No. 94-102, WT Docket No. 00-80 (rel. May 18, 2000) ("Notice").

^{2/} See, e.g., SCC Communications at 2-3, BellSouth at 2-3, Verizon Wireless at 3-4, 6, CTIA at 2-3, VoiceStream Wireless Corporation Comments at 4, ALLTEL at 2, SecureAlert at 5.

^{3/} See, e.g., VoiceStream Wireless Corporation Comments at 3-4, Verizon Wireless 4-6.

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the call is coming from a non-service initialized handset and that identifying the location of the caller is of immediate importance.^{4/} AT&T agrees that this capability would provide public safety benefits. In fact, the Telecommunications Industry Association's TR45.2 AHES subcommittee is already developing such a capability for inclusion in the Phase II E-911 standard (J-SDT-036). When networks are equipped with this functionality, PSAPs will be able to identify handsets that cannot receive a call back and those that are making repeat 911 calls.

Once such standards are adopted and the necessary technology is tested and available for deployment, AT&T plans to incorporate this capability in its network as part of its Phase II implementation. At that point, this functionality will also be available retroactively in areas that have implemented Phase I. However, it is not currently available and will not be prior to the implementation of Phase II.

In view of the wireless industry's voluntary efforts to provide identification capability within a reasonable period of time, requiring it as an additional E-911 mandate is unnecessary. Indeed, attempting to impose a mandate at this stage of the standards-setting process would only delay these efforts and divert the wireless industry's resources from the more important obligations of implementing Phase I and Phase II E-911 services. AT&T looks forward to working with the public safety community and other members of the wireless industry in developing this capability and other means of ensuring that the public safety community is provided with as much information about 911 callers as is reasonably possible.

^{4/} Initial Comments of the Texas Commission on State Emergency Communications, Texas Emergency Communication Districts, the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, Inc. and the National Association of State Nine-One-One Administrators ("Public Safety Entities Comments").

CONCLUSION

The Commission should continue to exempt covered carriers from providing call back numbers to PSAPs when the wireless handset is not associated with call back number capability. Other means of improving emergency services available to callers with non-service initialized phones appear to be feasible, however, and AT&T will continue to work with its industry colleagues to make these improvements available as quickly as possible.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Michelle Mundt, hereby certify that on this 5th day of July 2000, I caused copies of the foregoing "Reply Comments of AT&T Wireless Services, Inc." to be sent to the following by either first class mail, postage prepaid, or by hand delivery (*):

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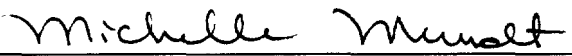
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